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JOHN W. BARTLETT
PARTNER

March 4, 2025

Via CM/ECF

Hon. Cathy L. Waldor, U.S.M.J.
Dr. Martin Luther King Justice Building
470 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

Re: Christopher Curtis Bellinger III v. The City of Perth Amboy, et al.
Docket No.: 24-CV-8442-JKS-CLW

Dear Your Honor:

This firm represents all named Defendants in this civil action. On December 18, 2024, Your Honor entered a Pretrial Scheduling Order setting, among other deadlines, March 4, 2025, as the deadline for paper discovery responses, and March 18, 2025, as the deadline for motions to amend pleadings or add new parties. [See Dkt. 26 at ¶¶ 2-3, 5-6]. The parties have been diligently working to meet these deadlines; however, due in part to the large number of individual Defendants we need to speak with to prepare through written discovery responses, more time is needed. Accordingly, ***with the consent of Plaintiff's Counsel***, we write to request a 30-day extension of said deadlines. With the Court's approval, the new deadline for Interrogatory and Document Request responses would be April 4, 2025, and the new deadline to add new parties or amend pleadings would be April 18, 2025.

If this request meets Your Honor's approval, please "so order" it below and have it entered on the docket, or contact me and we will submit a proposed form of Order for the Court's use. Thank you very much for your attention and courtesies.

Respectfully submitted,

MURPHY ORLANDO LLC


John W. Bartlett, Esq.

c: All Counsel of Record (via CM/ECF)

SO ORDERED. The deadlines in paragraphs 2, 3, 5, and 6 of the Court's Pretrial Scheduling Order are hereby extended as set forth above.

Hon. Cathy L. Waldor, U.S.M.J.